

REVISED EXHIBIT B
TO PROPOSED PRETRIAL ORDER

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

VALERIE HUE,)	
)	
Plaintiff,)	Civil Action No. 05-225-KAJ
)	
v.)	
NCO FINANCIAL SYSTEMS, INC., a)	
Delaware corporation, trading as NCO)	
FINANCIAL COMMERCIAL SERVICES,)	
)	
Defendant.)	

NCO'S LIST OF POTENTIAL EXHIBITS AND
PLAINTIFF'S OBJECTIONS THERETO

<u>NO.</u>	<u>NAME OF DOCUMENT</u>	<u>DATE</u>	<u>F.R.E.</u>
Plaintiff bates no's 000001-000002	Memo from V. Hue to T. Fox RE Comments made by Bill Savage	02/02/04	401
Plaintiff: No objection.			
000004	Check Verification Chart	No Date	401 / 803(6)
Plaintiff: Objection – relevance; lack of foundation.			
000009-000010	Email from Belly dance to S. Leckerman, and T. Fox RE Valerie Hue	01/22/04	401 / 801(d)
Plaintiff: No objection except “Belly Dance” shall be redacted pursuant to motion in limine.			
000013	Check Fax Authorization Form	No Date	401 / 803(6)
Plaintiff: Objection – relevancy; lack of foundation.			
000014	Check Verification Chart	No Date	401 / 803(b)
Plaintiff: Objection – relevancy; lack of foundation.			
000015-000016	Memo from V. Hue to S. Leckerman, T. Fox, HR and V. Hue RE Suspension	01/27/04	401 / 801(d)
Plaintiff: No objection.			
000017-000019	List of checks that V. Hue was told to investigate after audit.	1/04	401 / 801(d)
Plaintiff: No objection.			

000020	Form RE 59 Checks/Redips	8/26/04	401
Plaintiff: No objection.			
000022	Memo from P. Buggelin to all Collection Personnel RE Statement of Policy	12/26/01	401
Plaintiff: No objection.			
000023	January Dover Office Line-Up from V. Hue to K. Obenshain	No Date	401 to issue of NCO's damages
Plaintiff: No objection.			
000025-000026	Email from S. McHugh to J. Birdsong RE NSF's	01/21/04 (e-mail chain beginning in 2003)	401
Plaintiff: No objection.			
000069	Memo from P. Buggelin to All Sales and Collection Managers RE Accounting Compliance	01/16/02	401
Plaintiff: No objection.			
000084	Email from K. Obenshain to V. Hue RE verbal discussion	09/24/02	401 / impeachment
Plaintiff: Objection – relevancy; unduly prejudicial (Rule 403). See motion in limine.			
000085, 89 - 99	JDS of V. Hue / V. Hue's Diary	No Date	801(d)
Plaintiff: Objection to JDS; relevancy; unduly prejudicial. See motion in limine. No objection to diary pages except all of 000099 and in 000097 the reference to sexual relations between Dan and Kim which is irrelevant and prejudicial.			
000124-000180	Conversation Transcribed from Tape-Recording between Rick Boudreau, Phil Weaver, and Ted Fox	No Date	401
Plaintiff: No objection.			
000183	New Found Fees/Breakout Sheet for Matt Lane	01/04	401 to issue of NCO's damages
Plaintiff: Objection – hearsay; relevancy.			
000255	Handwritten EOM Worksheet	No Date	401 to EOM process
Plaintiff: Objection – hearsay; relevancy.			
000262	EOM Projection Worksheet	01/16	same
Plaintiff: Objection – hearsay; relevancy.			
000264	EOM Worksheet	01/16/04-01/23/04	same
Plaintiff: Objection – hearsay; relevancy.			

000271	EOM Worksheet	No Date	same
Plaintiff: Objection – hearsay; relevancy.			
000272	EOM Projection Worksheet	01/19-01/21	same
Plaintiff: Objection – hearsay; relevancy.			
000280	Recruiting Pipeline	No Date	401 to issue of NCO's damages
Plaintiff: Objection – hearsay; relevancy.			
000407-000408	Collector Commissionable Business Report for LB Department	01/21/04	401 to issue of NCO's damages
Plaintiff: No objection.			
000420	Compliance Procedure Memorandum	No Date	401
Plaintiff: Objection – relevancy.			
000616-...	Pages 1 and 7 and 19 from NCO Employee Handbook	No Date	401
Plaintiff: No objection.			
000631-000717	NCO Management Employment Practices Training Manual	12/01	401
Plaintiff: No objection.			

<u>NO.</u>	<u>NAME OF DOCUMENT</u>	<u>DATE</u>	<u>F.R.E.</u>
NCO's bate nos: 000002-000003	E-mail From P. Weaver to Commercial Ops. Mgrs. regarding NSF's	03/05/03	401
Plaintiff: No objection.			
000004	Memorandum from B. Laiche to K. Obenshain regarding EOM Check Verification Process	07/15/03	401
Plaintiff: No objection.			
000006	E-mail from K. Obenshain to B. Laiche regarding EOM Check Verification Process	08/20/03	401
Plaintiff: No objection.			
000016-000017	E-mail from S. McHugh to J. Birdsong regarding NSF's	01/21/04 (e-mail chain beginning 2003)	401
Plaintiff: No objection.			
000023-000024	E-mail from Belly Dance/Valerie Hue to S. Leckerman regarding Valerie Hue	01/22/04	401 / 801(d)
Plaintiff: No objection except "Belly Dance" reference shall be redacted pursuant to motion in limine.			

000034-000037	Settlement Agreement and Release of Reliability between NCO and Mathew Lane	09/22/04	401 to NCO's damages
Plaintiff: No objection.			
000054-000057	Termination of Employment documents for Mathew Lane	No Date	401 to NCO's damages
Plaintiff: No objection.			
000177	Promotion/raise signed by K. Obenshain.	2003	401
Plaintiff: No objection.			
000189-000192	Term Documents RE Bill Savage & statements re comments of B. Savage.	Oct 2001	401
Plaintiff: No objection.			
000195	Charge of Discrimination	02/3/04	401 / 801(d)
Plaintiff: No objection.			
000219-000221	2003 Collector Ranking	No Date	401 to NCO's damages
Plaintiff: Objection - relevancy.			
000278	Valerie Hue's promotion to GCM signed by K. Obenshain	4/23/02	401
Plaintiff: No objection.			
000321	Valerie Hue's Disciplinary Write-up as gcm	2002	401
Plaintiff: Objection – relevancy; unduly prejudicial. See motion in limine.			
000463-466	DOL Unemployment Compensation Benefits Hearing Findings re Mathew Lane	3/2004	401 to NCO's damages
Plaintiff: Objection – hearsay; relevancy; prejudicial; misleading and confusing (Rule 403).			
000467 - 468	Hue's memo to Leckerman in Jan 04 re suspension and termination	1/2004	401 / 801(d)
Plaintiff: No objection.			
000469	Memo for Record by K. Obenshain re Dover Investigation	1/22/04	401
Plaintiff: No objection.			

000470 - 71	Hue's e-mail in Jan 04 re suspension and termination	1/04	401 / 801(d)
Plaintiff: No objection except references to "Belly Dance" shall be redacted.			
000472	Statement of B. Laiche		401 / 613(a)
Plaintiff: Objection – hearsay; relevancy; misleading and confusing (Rule 403).			
000473 – 74	Statement of D. McQuisten re wrongful instructions by Hue	1/21/04	401 / 613(a)
Plaintiff: No objection.			
000475-76	Statement of M. Lefevre re wrongful instructions by Hue	1/21/04	401 / 613(a)
Plaintiff: Objection - hearsay.			
000477 – 78	Statement of B. Reavis re wrongful instructions by Hue	1/21/04	401 / 613(a)
Plaintiff: Objection - hearsay.			
000479	Term doc of M. Lane signed 1/21/04 by V. Hue	1/21/04	401 to NCO's damages
Plaintiff: No objection.			
000483	Signed acknowledgement of M. Lane that he read Direct Check/Phone Pay Procedure	6/2003	401
Plaintiff: Objection – hearsay; relevancy.			
000495	Statement of Jim Sprader	06/24/04	401 / 613(a)
Plaintiff: Objection - hearsay; relevancy; misleading and confusing (Rule 403).			
000497	Statement of Kimberly Marlow	01/22/04	401 / 613(a)
Plaintiff: No objection.			
000499	Statement of Eric Shaw	01/22/04	401 / 613(a)
Plaintiff: No objection.			
000506	Statement of Brian Laiche	06/28/04, 01/22/04, 07/15/03	401 / 613(a)
Plaintiff: Objection - hearsay; relevancy; misleading and confusing (Rule 403).			
000510	Statement of Darrin Deesch	06/22/04	401 / 613(a)
Plaintiff: Objection - hearsay; relevancy; misleading and confusing (Rule 403).			
000512	Statement of Lenny Ciccarone	06/22/04	401 / 613(a)
Plaintiff: Objection - hearsay; relevancy; misleading and confusing (Rule 403).			

000514	Statement of Manny Cardozo	06/24/04	401 / 613(a)
Plaintiff: Objection - hearsay; relevancy; misleading and confusing (Rule 403).			
000516	Statement of Joe Batie	06/22/04	401 / 613(a)
Plaintiff: Objection - hearsay; relevancy; misleading and confusing (Rule 403).			
000518	Statement of Mike Scher	06/24/04	401 / 613(a)
Plaintiff: No objection.			
000520	Statement of Joe Thomas	06/24/04	401 / 613(a)
Plaintiff: Objection - hearsay; relevancy; misleading and confusing (Rule 403).			
000522	Statement of Kathy Obenshain	06/24/04	401 / 613(a)
Plaintiff: No objection.			
000551	K. Obenshain's 2002 memorandum re direct check process	8/2002	401
Plaintiff: Objection - hearsay; relevancy.			
000609	E-mail from Chris Santasiero to Vera Migliarese regarding the redeposit of NSF check	11/21/2003	401
Plaintiff: Objection - hearsay; relevancy.			
000611	E-mail from Mike Regenold to Vera Migliarese regarding check redeposit	11/21/2003	401
Plaintiff: Objection - hearsay; relevancy.			
000612	E-mail from Steve Hallam to Vera Migliarese regarding redeposit of check	11/22/2003	401
Plaintiff: Objection - hearsay; relevancy.			
000615	E-mail from Leigh Nickerson to Vera Migliarese	11/24/2003	401
Plaintiff: Objection - hearsay; relevancy.			
000629	E-mail from Bruce Richardson to Vera Migliarese regarding check redeposit	11/25/2003	401
Plaintiff: Objection - hearsay; relevancy.			
000667	E-mail from Jessie Montoro to Vera Migliarese regarding redeposit of check	12/10/2003	401
Plaintiff: Objection - hearsay; relevancy.			
000676	E-mail from Leigh Nickerson to Vera Migliarese regarding redeposit of check	12/11/2003	401
Plaintiff: Objection - hearsay; relevancy.			

000803	E-mail from Leigh Nickerson to Vera Migliarese regarding redeposit of check	12/31/2003	401
Plaintiff: Objection – hearsay; relevancy.			
000804	E-mail from Leigh Nickerson to Vera Migliarese regarding redeposit of check (Dover Redips)	12/31/2003	401
Plaintiff: Objection – hearsay; relevancy.			
000852	E-mail from Leigh Nickerson to Vera Migliarese regarding redeposit of check	01/09/2004	401
Plaintiff: Objection – hearsay; relevancy.			
001336	Memo to Collectors from Phil Weaver	06/05/2001	401
Plaintiff: No objection.			
001338-001339	M&M policy memorandum requiring verification for all post-date checks	8/22/94	401
Plaintiff: Objection – hearsay; relevancy.			
1353	V. Hue's resignation letter to B. Savage	1998	401
Plaintiff: Objection – relevancy; confusion of issues (Rule 403).			
1463	1/26/95 memo from B. Savage to V. Hue re complaint re B. Cox	1/26/95	401
Plaintiff: Objection – hearsay; relevancy; confusion of issues (Rule 403).			
1537	1994 Memo from B. Savage to V. Hue	1994	401
Plaintiff: Objection – hearsay; relevancy; confusion of issues (Rule 403).			
1583 – 84	V. Hue's resume		401
Plaintiff: Objection – relevancy.			
001618-001619	Term docs signed by K. Obenshain (1/04)	1/29/04	401
Plaintiff: No objection.			
001637	2003 signed acknowledgement by V. Hue that she read and would comply with the Direct Check/Phone Pay Procedure	2003	401 / 801(d)
Plaintiff: No objection.			
001652	Signed "Accounting Compliance" by V. Hue stating that she understands the "zero tolerance" policy on realization of revenue before recovery is completed and verified.	1/2002	401 / 801(d)
Plaintiff: No objection.			

001671 – 1672, 1684	V. Hue signed Employee Handbook Acknowledgement (NCO)	12/99 & 4/01	401 / 801(d)
Plaintiff: No objection.			
001738	E-mail from Valerie Hue to Johnny Cortez RE: Blind Fee Contest	01/06/2004	401
Plaintiff: No objection.			
001739	Chart: Blind Fee Postdate Contest	12/31/2003	401
Plaintiff: No objection.			
	Complete Copy of 1/04 NSF Report		401
Plaintiff: Objection – Defendant has not adequately identified the exhibit.			
	All Exhibits Identified and/or Introduced by Plaintiff at Trial		
Plaintiff: No objection to exhibits introduced by plaintiff. Plaintiff objects to exhibits “identified” by plaintiff because defendant has not made clear what is meant by “identified.”			
	Deposition transcripts of D. McQuisten, K. Obenshain, P. Weaver, R. Boudreau		
Plaintiff: No objection.			
	Demonstrative exhibit regarding damages caused by loss of employee, Matthew Lane		
Plaintiff: Objection – Defendant has not adequately described the exhibit.			
	Demonstrative exhibit regarding re-dip of NSF check(s)		
Plaintiff: Objection – Defendant has not adequately described the exhibit.			

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